

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----	x	
TZVI WEISS, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	CV 05-4622 (CPS) (KAM)
	:	
NATIONAL WESTMINSTER BANK PLC,	:	
	:	
Defendant.	:	
-----	x	

**DECLARATION OF JONATHAN I. BLACKMAN**

Jonathan I. Blackman declares as follows:

1. I am a Member of the Bars of the State of New York and of this Court and of the law firm of Cleary Gottlieb Steen & Hamilton LLP, attorneys for defendant National Westminster Bank Plc ("NatWest"). I make this declaration pursuant to the Minute Order issued following the telephonic status conference held with the Court on January 12, 2007.

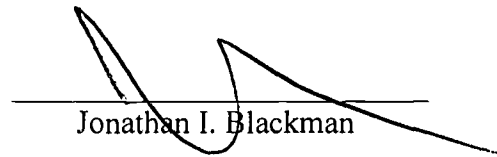
2. I hereby confirm that subject to, and without waiver of, the reservation of rights, objections, including objections as to relevance, overbreadth and excessive burden, and privileges raised in NatWest's Responses And Objections To Plaintiffs' First Request For The Production Of Documents dated August 14, 2006, NatWest has produced and/or will produce all non-privileged documents in its possession, custody or control that are not covered by the English law bank secrecy objections raised in NatWest's opposition to plaintiffs' motion to compel discovery that is currently pending before the Court, and that appear to be reasonably responsive to plaintiffs' document requests and relevant to the claims and defenses of the parties in this action. In particular, NatWest has produced and/or will produce relevant bank secrecy, anti-money laundering, anti-terrorism financing, know your customer, document retention, and

account opening policies and procedures, as well as relevant organizational charts. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, if any additional responsive non-privileged documents should be discovered, NatWest will produce them subject to the foregoing.

3. This declaration is based upon a search of NatWest's files undertaken by NatWest under the supervision of attorneys at Cleary Gottlieb Steen & Hamilton LLP.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
January 19, 2007



Jonathan I. Blackman

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

---

TZVI WEISS, *et al.*,

Plaintiffs,

-against-

CV-05-4622 (CPS) (KAM)

NATIONAL WESTMINSTER BANK PLC,

Defendant.

---

DECLARATION OF JONATHAN I. BLACKMAN

---

CLEARY GOTTlieb STEEN & HAMILTON LLP  
ATTORNEYS FOR DEFENDANT NATIONAL WESTMINSTER BANK PLC

ONE LIBERTY PLAZA  
BOROUGH OF MANHATTAN  
NEW YORK, N Y 10006  
(212) 225-2000

COPY RECEIVED

THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 20\_\_\_\_

---

---

---